



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

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Ivan Sidney, Village Administrator
P.O. Box 260
Polacca, Arizona 86042

Dear Mr. Sidney:

Enclosed is a copy of the sanitary survey report for the Polacca water system. Dan Fraser, of Sleeping Giant Environmental Consultants, conducted this survey on September 11, 2019, under contract with EPA. One of the requirements of the Safe Drinking Water Act (SDWA) is a periodic sanitary survey of the public water system to assess the ability of the system to provide safe and clean drinking water for the populations served. In general, a sanitary survey is required not less than once every 3-5 years.

During the sanitary survey conducted on the Polacca water system on September 11, 2019, the inspector found four deficiencies which are of significant health risk to the system and the people served by the system. These deficiencies have been deemed significant deficiencies and are of the greatest health threat. Under the SDWA's Ground Water Rule (GWR), significant deficiencies are defined to include, but are not limited to, defects in design, operation, or maintenance, or a failure or malfunction of the sources, treatment, storage or distribution system that EPA determines to be causing, or have potential for causing, the introduction of contamination into the water delivered to consumers. See 40 C.F.R. § 141.403(a)(4).

The significant deficiencies, summarized in the enclosure entitled "Required Corrections," must be corrected within a specified time frame, which is detailed below. The purpose of this letter is to initiate the consultation period during which you, the owner, must create a plan to correct these significant deficiencies. This plan must be approved by EPA before it can be implemented.

The specific actions you take to address the significant deficiencies must be approved by EPA in advance. Recommended solutions to the deficiencies have been provided, but if there are other options that you believe would correct the deficiencies, you may consult with EPA and seek approval.

In addition to these significant deficiencies, Section K of the report outlines other water system deficiencies as well as recommended improvements to ensure the delivery of safe water. Although EPA did not identify these as significant deficiencies, we highly recommend that you address all system deficiencies described in the report. Higher priority health risks represent higher potential for the introduction of contamination into the water delivered to customers and require attention as soon as possible.

Pursuant to 40 C.F.R. § 141.403(a)(4), you have 30 days from the date of this letter to consult with us to develop a plan to correct the significant deficiencies. The EPA-approved plan must be acted upon within 120 days from the date of this letter, or another EPA-approved timeframe. If we do not hear back from you by December 12, 2019, additional steps may be taken by EPA, which could include elevating this matter to the attention of EPA's Enforcement Office.

During the survey, thein inspector also documented also found an increase in the population served by the Polacca water system from 3,917 to 5,106 people. Under the Revised Total Coliform Rule, With an updated population, the Polacca water system must should now collect six coliform samples per month. Please see the attached *Public Water System Monitoring Schedule* for this system's updated monitoring requirements.

Please call Jeffrey Tsai at (415) 972-3459 or email at tsai.yun-jui@epa.gov to discuss your plans for remediating the above-described deficiencies and to update your sample siting plan to include additional bacteriological sample sites. Thank you for your attention to these important issues.

Sincerely,

Emmanuelle Rapicavoli
Team Leader, Tribal Drinking Water Team

Enclosures

cc: Timothy Nuvangyaoma, Chairman
Alfonso Sakeva, Water Operator
Sharon Grover, Administrative Assistant
Phyllis Wittsell, CSA
Belma Navakuku, CSA
Jarrett Calnimpewa, Program Manager